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14 *Attorneys for Plaintiff*
15 Rearden LLC and Rearden Mova LLC

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 OAKLAND DIVISION

19 REARDEN LLC, et al.,

20 Plaintiffs,

21 v.

22 THE WALT DISNEY COMPANY, *et al.*,

23 Defendants.

24 REARDEN LLC, et al.,

25 Plaintiffs,

26 v.

27 TWENTIETH CENTURY FOX FILM
CORPORATION, *et al.*,

28 Defendants.

Case No. 4:17-cv-04006-JST
4:17-cv-04191-JST

**DECLARATION OF
RICHARD DADUFALZA IN
OPPOSITION TO DEFENDANTS'
MOTIONS FOR SUMMARY
JUDGMENT ON CAUSAL NEXUS
ISSUE**

Judge: Hon. Jon S. Tigar
Date: To be set
Time: To be set

Ctrm.: 6, 2nd Floor

1 I, Richard Dadufalza, declare as follows:

2 1. I am employed by Hagens Berman Sobol Shapiro LLP as the firm's Help Desk
3 Systems Administrator. I make this declaration based on my personal knowledge, and if called
4 as a witness, I could testify competently as to the matters stated herein.

5 2. On May 19, 2020, I downloaded a copy of "Beauty and the Beast cast live Q&A on
6 Facebook," the IMAX Advance Screening at the TCL Chinese Theater in Los Angeles on March 7,
7 2017 at the following URL: https://www.youtube.com/watch?v=4h_YlIMlUkc A true and correct
8 copy is attached hereto as Exhibit 1.

9 3. On May 19, 2020, I downloaded a copy of "Beauty & The Beast: How Dan Stevens
10 Transformed Into Beauty's Beast | People NOW | People," the *People* magazine interview of Dan
11 Stevens on March 16, 2017 at the following URL:
12 https://www.youtube.com/watch?v=m5_5YW6ozHo A true and correct copy is attached hereto as
13 Exhibit 2.

14 4. On May 19, 2020, I downloaded a copy of "BEAUTY AND THE BEAST interviews
15 - Dan Stevens, Josh Gad, Luke Evans, Audra McDonald, Alan Menken," the Fox 5 entertainment
16 reporter, Kevin McCarthy interview of *Beauty and the Beast* cast members on March 4, 2017 at the
17 following URL: <https://www.youtube.com/watch?v=DVogFscddVY> A true and correct copy is
18 attached hereto as Exhibit 3.

19 5. On June 1, 2020, I downloaded a copy of the *Beauty and the Beast* Paris press
20 conference with the film's cast on February 20, 2017 at the following URL:
21 https://www.youtube.com/watch?v=R9mKV_gklgw A true and correct copy is attached hereto as
22 Exhibit 4.

23 6. On November 5, 2020, I downloaded a copy of the People.com article entitled "A 40-
24 Lb. Muscle Suit, Waltzing on Stilts: How Dan Stevens Transformed into Beauty's Beast published
25 on March 17, 2017 at the following URL: [https://people.com/movies/dan-stevens-transformation-](https://people.com/movies/dan-stevens-transformation-beauty-and-the-beast/)
26 [beauty-and-the-beast/](https://people.com/movies/dan-stevens-transformation-beauty-and-the-beast/) A true and correct copy is attached hereto as Exhibit 5.

27 7. On October 20, 2020, beginning with the Blu-ray versions of *Beauty and the Beast*
28 and *Deadpool*, I captured video clips from these two disks, including portions of the *Beauty of a Tale*

1 and *Deadpool: From Comics to Screen...to Screen!* Featurettes. Copies of these video clips are
2 attached hereto as Exhibits 6 and 7, respectively.

3 8. On November 10, 2020, I captured a video clip at time stamps 1:57-2:51; 4:45-10:10
4 of the video transcript of the deposition of William Condon dated July 30, 2020. A true and correct
5 copy is attached hereto as Exhibit 8.

6 9. On November 10, 2020, I captured a video clip at time stamps 10:20-13:44 of the
7 video transcript of the deposition of William Condon dated July 30, 2020. A true and correct copy is
8 attached hereto as Exhibit 9.

9 10. On November 10, 2020, I captured a video clip at time stamps 13:51-18:48 of the
10 video transcript of the deposition of William Condon dated July 30, 2020. A true and correct copy is
11 attached hereto as Exhibit 10.

12 I declare under penalty of perjury that the foregoing is true and correct.

13 Executed on November 18, 2020

Signed in Seattle, Washington by:

14 DocuSigned by:

15 4463279979A4401
Richard Dadufalza